

United States District Court

APR 02 2009 DF

Michael N. Milby, Clerk
Laredo Division

Southern

DISTRICT OF Texas

UNITED STATES OF AMERICA
V.

IVORY, Brandon D.

CRIMINAL COMPLAINT

CASE NUMBER: 509 mj 842

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or March 31, 2009 in Webb County, in the Southern District of Texas defendant(s) did, (Track Statutory Language of Offense)

Knowingly and unlawfully possess with the intent to distribute a controlled substance listed under Schedule I, Title II, of the Controlled Substances Act, to wit; approximately 569.0 kilograms of marijuana.

in violation of Title 21 United States Code, 841 (a) (1)

I further state that I am a(n) DEA Special Agent (SA) and that this complaint is based on the following
Official Title

facts: On 03/31/2009, at approximately 8:20PM, Brandon D. IVORY arrived at the USBP IH-35 Checkpoint, north of Laredo, TX driving a maroon 2001 Peterbilt Tractor, TX license R81715, hauling a white trailer, TX license [REDACTED]. At the primary inspection lane, there was a canine alert to the trailer. The vehicle was then referred to the secondary inspection lane where USBP Agents discovered and seized from the trailer 26 bundles of marijuana, weighing approximately 569.0 kgs. Further investigation revealed that while the trailer was sealed, the trailer seal number on the trailer did not match the seal number on the bill of lading for the legitimate cargo. Inside the tractor, a box of store-bought trailer seals was found with seals matching the one that had been on the trailer. Also discovered inside the tractor was the unused true trailer seal matching the number on the bill of lading. IVORY made inconsistent statements with regard to the discrepancies between the seals and the bill of lading as well as his whereabouts after picking up the legitimate cargo.

Continued on the attached sheet and made a part

☐ Yes ☒ No

Gregory A. Krywy
DEA SA Gregory A. Krywy

Signature of Complainant

Sworn to before me, and subscribed in my presence,

April 02, 2009
Date

at Laredo, Texas
City and State

U.S. Magistrate Judge Scott Hacker
Name and Title of Judicial Officer

[Signature]
Signature of Judicial